

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

JONATHAN SANTIAGO ROSARIO,	:	CIVIL ACTION
Plaintiff,	:	
	:	
v.	:	5:15-cv-866
	:	
TRANS UNION, LLC, et al.,	:	
Defendants.	:	

**NOTICE OF SCHEDULING OF INITIAL FED.R.CIV.P. 16 PRETRIAL CONFERENCE**

An initial Federal Rule of Civil Procedure 16 pretrial conference has been scheduled before Judge Joseph F. Leeson, Jr. in the above-captioned case. The conference will be held **in person** at the Edward N. Cahn Courthouse and Federal Building, Courtroom C, 504 West Hamilton Street, Allentown, Pennsylvania 18101 on **Tuesday, June 2, 2015, at 11:00 a.m.**

A copy of the Policies and Procedures for Judge Leeson is available on the court's website at <https://www.paed.uscourts.gov>. Prior to the initial pretrial conference, the parties are directed to confer and prepare a joint report (using the attached format "Joint Report by Counsel to the Court of Rule 26(f) Meeting") pursuant to Federal Rule of Civil Procedure 26(f). This joint report is to be faxed to chambers at 610-821-1481 no later than three days prior to the conference. Requests to reschedule this conference are strongly discouraged, and the conference will only be rescheduled when compelling circumstances so require.

BY THE COURT:

By: /s/ Diane J. Abeles  
Diane J. Abeles, Civil Deputy Clerk  
The Honorable Joseph F. Leeson, Jr.  
Diane\_J\_Abeles@paed.uscourts.gov  
610-391-7020

Dated: May 1, 2015

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

_____	:	CIVIL ACTION
	:	
Plaintiff,	:	
	:	
v.	:	NO. _____
	:	
_____	:	
	:	
Defendant.	:	

JOINT REPORT BY COUNSEL TO THE COURT OF RULE 26(f) MEETING  
(To Be Sent to Judge's Chambers in Advance of Initial Rule 16 Pretrial Conference)

In compliance with Federal Rule of Civil Procedure 26(f), counsel for the parties jointly report as follows:

1. Jurisdiction: State Basis for Jurisdiction of the Court:  
\_\_\_\_\_
2. Trial:  
Jury Trial \_\_\_\_\_  
Non-Jury Trial \_\_\_\_\_  
Arbitration \_\_\_\_\_  
(Check One)
3. Plaintiff Counsel: Name(s) of Plaintiff counsel attending Rule 16 Conference:  
\_\_\_\_\_
4. Defense Counsel: Name(s) of Defense counsel attending Rule 16 Conference:  
\_\_\_\_\_
5. Date of Rule 26 Conference: State the date the parties held required Rule 26 Conference: \_\_\_\_\_

6. Compliance with Rule 26(a) Self-Executing Disclosure Requirement: Have all parties complied with Rule 26(a) duty of self-executing disclosure?

(a) Yes \_\_\_\_\_ No \_\_\_\_\_ (Check One)

(b) If no, state date compliance will occur: \_\_\_\_\_

7. Discovery:

(a) The parties anticipate that discovery will be completed within \_\_\_\_\_ days (the Court allows up to 90 days from the date of the initial Rule 16 pretrial conference to complete discovery).

(b) If you contend the discovery period should exceed 90 days, please state reason: \_\_\_\_\_

(c) Does either side anticipate the use of experts?

(a) Yes \_\_\_\_\_ No \_\_\_\_\_ (Check One)

(b) If Yes, what is the proposed deadline for completion of all expert discovery? \_\_\_\_\_

(d) Have the parties discussed issues relating to claims of privilege or of protection of trial-preparation material, as required by Rule 26(f)(3)(D)? \_\_\_\_\_

(e) Identify any other discovery issues which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which should be included in a particularized discovery plan. \_\_\_\_\_

(f) Electronic Discovery: It is expected that the parties will reach an agreement on how to conduct electronic discovery. In the event the parties cannot reach such an agreement before the Rule 16 scheduling conference, the Court will enter an order incorporating default standards. The default order can be viewed at [www.paed.uscourts.gov](http://www.paed.uscourts.gov).

8. Case Dispositive Motions: Does either side expect to file a case-dispositive motion? \_\_\_\_\_ (Yes/No)

(a) If yes, under what Rule: \_\_\_\_\_

(b) If yes, specify the issue(s): \_\_\_\_\_

(c) Proposed deadline for filing dispositive motions: \_\_\_\_\_

9. Summary of Claims, Defenses and Relevant Issues:

You should assume that the Court has read the complaint and is familiar with the claims. However, the facts supporting those claims and defenses are not fully known. Therefore, counsel are to set forth concisely the factual background that the parties contend

support their claims and defenses (not to exceed one page in length per party):

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10. Settlement:

- (a) Do the parties want to explore with the Court possible settlement at the Rule 16 Conference?

Plaintiff: Yes/No

Defendant: Yes/No

- (b) Will all counsel have full authority to settle at Rule 16 Conference?

Yes \_\_\_\_\_ No \_\_\_\_\_ (Check One)

- (c) If no, state name of client(s) with such authority who will attend Conference:

- (d) The parties are to familiarize themselves with Local Rule 53.3 before responding. Recite the parties' discussion about early resolution through ADR, and explain what steps were taken by counsel to advise the client of alternative dispute resolution options: \_\_\_\_\_

- (e) Explain any decision not to seek early resolution and what mediation options the parties may consider and when mediation would be appropriate:

- (f) Has the plaintiff submitted a demand for settlement to defendant(s):

Yes \_\_\_\_\_ No \_\_\_\_\_

- (g) What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to? \_\_\_\_\_

- (h) Is a settlement conference at a future date likely to be helpful? \_\_\_\_\_ If so, when:

Early \_\_\_\_\_ (Yes/No) After Discovery \_\_\_\_\_ (Yes/No)

12. Estimated Trial Ready Date: Approximate date case should be trial-ready:

Time for Plaintiff's case: \_\_\_\_\_ Time for Defendant's Case: \_\_\_\_\_

13. Disposition by U.S. Magistrate Judge: What is the outcome of your discussions with your clients about proceeding before U.S. Magistrate Judge Henry S. Perkin for final disposition? \_\_\_\_\_

14. Other Matters:

Indicate discussion and any agreement on any matters not addressed above, or such matters upon which the involvement of the Court is requested.

\_\_\_\_\_

Counsel For \_\_\_\_\_

Date: \_\_\_\_\_

\_\_\_\_\_

Counsel For \_\_\_\_\_

Date: \_\_\_\_\_